Making Missouri a better place to ride a bicycle!

Missouri Bicycle Federation, Inc.

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I-29/I-35 Draft EIS
c/o HNTB
715 Kirk Drive
Kansas City, MO 64105

RE: I-29/I-35 Environmental Impact Statement

Many thanks to MoDOT, the Federal Highway Administration, and others involved with the Paseo Project for engaging with the bicycle/pedestrian community in Kansas City, for listening to the concerns of the many citizens who wrote to express their interest in creating bicycle and pedestrian access across the Missouri River, for conducting a study of the need for a bicycle and pedestrian crossing of the river near downtown Kansas City and the options available, and for the commitments MoDOT has made towards creating facilities for walking and bicycling on the Paseo Bridge and on the Heart of America Bridge.

We hope that the dialogue and citizen involvement that came out of this project will be able to continue on future projects in the metropolitan area and throughout the state.

It has become clear that bicyclists and pedestrians have important and legitimate needs and considerations in any transportation project within and urban area--even a freeway project. We hope that working to acknowledge those needs and concerns early in project planning on future projects may help to move projects forward and avoid antagonizing citizens or making them feel that their concerns are being ignored. Many problems and issues could be solved much more easily and simply if the need for bicycle and pedestrian movement along and across a corridor is acknowledged from the beginning and made a priority.

Bike/Ped on the Heart of America Bridge

We support MoDOT's commitment to create high-quality bicycle and pedestrian accommodations on the Heart of America bridge.

13A We strongly encourage MoDOT to complete the Heart of America bike/ped retrofit project soon, before the main Paseo project starts. Having no bicycle and pedestrian river crossing available in a major metropolitan area for *five more years* is really not acceptable in the 21st Century. Ways are opening up that may create an opportunity to do the Heart of America retrofit soon and we encourage MoDOT to cooperate in this process.

Bike/Ped on the Paseo Bridge

13B We support MoDOT's commitment to design and build the Paseo Bridge so that bicycle and pedestrian accommodations can be added to the structure.

We believe that MoDOT should be open to the possibility of including bicycle and pedestrian facilities as the Paseo structure is built. Depending on the outcome of the design process, opportunities may become apparent as the process moves forward. MoDOT and the designers should be open to these possibilities and encourage them to develop.

Just for example--if the bridge is built to carry 8 lanes of motor traffic, but is configured for only 6 lanes at the beginning, there is the opportunity to create a barrier-separated bicycle/pedestrian path on the bridge using some of the available space that is reserved for the two extra lanes. Then in future years when the extra lanes are needed the bike/ped "addition" can be added and that lane converted to freeway use.

Through clever design, the bicycle/pedestrian approaches to the bridge could be designed to work both for initial path configuration and also the later configuration that would be necessary when the bridge is converted to 8-lane use.

This is a possibility that would allow for the inclusion of bicycle and pedestrian accommodations at little extra cost for the initial period--which may be as long as 20 to 30 years.

This is just one idea for how bicycle and pedestrian accommodations could be included in the bridge at relatively low cost. We encourage MoDOT to be open and flexible as the design-build process moves forward and to make really viable bicycle and pedestrian accommodations a priority in the design-build process for the bridge and the corridor.

Bike/Ped Representation during the Paseo design-build process

MARC's TTPC recommended adding a bicycle/pedestrian representative to the Paseo Community Advisory Group. MoDOT's countersuggestion is to invite bicyclists & pedestrians to talk to the community group a time or two.

I recently gave a 30-minute presentation to the Community Advisory Group about the key bicycle and pedestrian issues involved with this project.

13C It is clear that there are many complex issues involved that go far beyond the bridge itself. Many of these issues involved details and priorities that no one on the advisory group is aware of.

These issues involve such things as:

- How the bike/ped path on the bridge will connect with area streets and trail systems
- How will bicycle and pedestrian access along the Paseo corridor be disrupted by the changes to the freeway and how can bicycle and pedestrian access up and down the corridor be facilitated.

There are no less than 11 bicycle and pedestrian crossing points of the freeway in the project area (see Exhibit 1: Eleven bicycle/pedestrian crossing points of the project corridor). Of those only one would currently be rated "acceptable" for bicycle and pedestrian use. All of these interchanges will be rebuilt as part of the Paseo project and this creates the opportunity make these interchanges safe and accessible for bicyclists and pedestrians.

If these changes are not made now, to create bicycle and pedestrian accessibility up and down the Paseo corridor and to create good, safe bicycle and pedestrian access across the Paseo corridor at these 11 crossing points, it will be an opportunity missed for another 50 to 100 years.

This is vitally important to the issue of bicycle and pedestrian accessibility in Kansas City's urban core because the freeway itself is one of the biggest impediments to bicycle and pedestrian travel in the urban core (see Exhibit 2: Bicycle/Pedestrian Islands in Kansas City's urban core).

If, due to a lack of foresight at this time, these interchanges are not designed to safely accommodate bicycle and pedestrian travel, they will remain unsafe for the next 50 to 100 years.

If the corridor is not designed to facilitate the movement of bicyclists and pedestrians along the corridor and to all the important destinations in Kansas City's urban core for which the freeway facilitates motor vehicle movement, these destinations will remain unconnected for bicyclists and pedestrians for 50 to 100 years.

For all of these reasons, the project needs to have ongoing input from bicycle and pedestrian users--whether as part of the Paseo Community Advisory Group or through some other regular means. The exact means or way is not of high importance. But of very high importance is involvement of the bicycle and pedestrian community and of planners and designers with experience in designing bicycle and pedestrian facilities, so that the bicycle and pedestrian aspects all up and down the corridor are designed the way the need to be.

Considerations for interchanges

At a minimum the following considerations are necessary for all interchanges and over/underpasses of local streets with the I-29/I-35 corridor. Bicyclists and pedestrians are allowed to use all of the cross streets and they do use them.

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- Sidewalks of sufficient width and on both sides of the roadway. Some of the cross-streets may not have sidewalks except in the immediate area of the freeway. But the freeway interchange is an especially dangerous and difficult area for pedestrians, so sidewalks are warranted in these locations.
- Crosswalks as needed, well designed, well marked, and maintained.
- Pedestrian heads and pedestrian phases on all traffic signals. Signal phases must be of sufficient length for bicyclists and pedestrians to safely cross the intersections.
- Bicycle "slots" to the left of right-turn lanes at intersections.
- Bicycle lanes or wide curb lanes.
- As short a curb radius as possible; radii no longer than 25 feet. Wider radii greatly increase the curb-to-curb distance for pedestrians and increase traffic speed, which is detrimental to bicyclists and pedestrians operating in these areas.
- Prefer 90-degree style intersections with local streets rather than ramp-style intersections, which are difficult and dangerous for bicyclists and pedestrians to traverse (see Exhibit 3).

Public input during the design-build process

MARC recommended a series of public meetings, "charettes", as part of the design-build process. We support this idea, which should involve the design-build teams so that they can gain an understanding of the community's needs and interests in this project.

Although there has been much public input up to this point, so many of the project design details have not been decided at this point, simply because the project is design-build.

So the question becomes, how will the design-build project incorporate public input in a meaningful way?

13E The Paseo Community Advisory Group is one way but it cannot be the only way. The community advisory group does not represent the depth and breadth of public interest throughout the Kansas City region. So additional, supplementary, and meaningful public input is needed beyond that group.

A well planned series of community charettes could be just such a way.

A single public meeting where the public looks at some displays and writes comments is not sufficient by any measure.

Is MoDOT really committed to incorporating public comment into the project in a meaningful way? Is MoDOT committed to making the design-build process a success in the public mind?

How MoDOT handles the public input from this point forward will give the best answers to these questions.

Economic justice

Allowing low-income neighborhoods to connect to jobs throughout this corridor is one important function of the freeway.

13F The freeway itself is a significant barrier to bicycle and pedestrian travel. Furthermore the freeway in the project area connects motorists over two significant barriers: the Missouri River and the main trunk railroad tracks that separate the Paseo Industrial District from the rest of North Kansas City.

If these same connections are not made for bicyclists and pedestrians operating along the freeway corridor, it means that a disproportionate share of low-income workers who use a combination of walking, bicycling, and transit to get to work and back will be restricted from employment and shopping opportunities.

We know that North Kansas City has a nighttime population of under 5,000 and a daytime population of over 25,000. Many of those 25,000 jobs are manufacturing and warehouse jobs in low- to middle-income brackets.

We know that 25% of Missourians (and 13% of adult Missourians) do not have a driver's license. We know that 13% of Kansas City, Missouri, households do not own an automobile.

We also know that the Columbus Park and Helm Park neighborhoods just on the south end of the Paseo Bridge, and the North Kansas City and Avondale neighborhoods just to the north of Hwy 210 are working class neighborhoods that have an even greater percentage than average of individuals and households without access to an automobile and rely to even a greater extent than average on walking, bicycling, and transit.

That is why the MARC board voted to recommend that MoDOT take the opportunity to create bicycle and pedestrian access all along the Paseo corridor. It is not necessarily that a bicycle/pedestrian path must parallel the freeway within the right-of-way. Rather the issue is that the opportunity must be taken to provide *access* for bicyclists and pedestrians across the same major barriers across which the freeway gives access to motorists.

Those barriers can be simply stated:

- The Missouri River
- The Burlington Northern Railroad yard

Missouri River access
Bicycle/pedestrian access on the Paseo Bridge across the Missouri River would give access between these points--which are otherwise inaccessible for bicyclists, pedestrians, and transit users (who use bicycling/walking to make the final connection on their trip):

- Helm Park Neighborhood to Paseo Industrial District
- Columbus Park Neighborhood to Paseo Industrial District
- Port Authority Mixed Use Development to Paseo Industrial District

(See Exhibit 4.)

Bicycle/pedestrian access along the Paseo corridor across the Burlington Northern railroad yard would give access between these points--which are otherwise inaccessible for bicyclists, pedestrians, and transit users:

- 16th Ave, downtown, and other areas of North Kansas City to Paseo Industrial District
- Avondale neighborhood to Paseo Industrial District

(See Exhibit 5.)

Bicycle/pedestrian access along the Paseo corridor across *both* the Burlington Northern railroad yard *and* the Missouri River would, in addition to the access described above, give access between these points--which are otherwise inaccessible or a significantly longer trip (more than one mile greater in each direction) for bicyclists, pedestrians, and transit users:

- 16th Ave, downtown, and other areas of North Kansas City to Helm Park neighborhood
- 16th Ave, downtown, and other areas of North Kansas City to East Bottoms industrial district
- 16th Ave, downtown, and other areas of North Kansas City to Port Authority Mixed Use Development
- Avondale neighborhood to Helm Park neighborhood

- Avondale neighborhood to East Bottoms industrial district
- Avondale neighborhood to Port Authority Mixed Use Development

(See Exhibit 6.)

If bicycle and pedestrian access across either the Paseo Bridge or the Burlington Northern Railroad Yard is denied, then the connections listed above will not exist or will be much more difficult, lengthy, and/or dangerous for bicyclists and pedestrians who walk or bicycle to work.

Because each of this connections is to an area of moderate to low income neighborhoods to an area of moderate to low income employment opportunities, and because citizens in lower income brackets depend most heavily on walking, bicycling, and transit to get from home to work, the consequences of this denial of access will fall most heavily on those in lower income brackets.

Denial of access is thus a serious matter of economic justice.

Should bike/ped access be included on the I-29/I-35 railroad bridge

The MARC Board recommended that bicycle/pedestrian access be included along the Paseo Corridor from Front Street to 16th Avenue in North Kansas City.

13G Although a bicycle/pedestrian pathway could be included within the freeway right-of-way all along the Paseo corridor, for most of the distance such a pathway is not necessary. Bicycle and Pedestrian access could proceed along a parallel street--where bicyclists and pedestrians are already operating.

The two key points, however, the two points where bicycle and pedestrian access must be along the freeway right-of-way, are the Missouri River and the bridge over the Burlington Northern Railroad yard.

What about bicycle/pedestrian access across the railroad yard bridge?

Section 652.5 of the Federal-Aid Policy Guide says, "The safe accommodation of pedestrians and bicyclists should be given full consideration during the development of Federal-aid highway projects, and during the construction of such projects."

MoDOT's Practical Design Implementation Guide states: "The provision of bicycle facilities on improvement projects during planning, and design activities is necessary when any one or more of the following conditions exist" and lists six warrants. The I-29/I-35 Railroad Bridge project meets these four of the six total:

- There is public support through local planning organizations for the provision of bicycle facilities.
- Bicycle traffic generators are located near the proposed project (i.e. residential neighborhoods, employment centers, shopping centers, schools, parks, libraries, etc.).
- There is evidence of bicycle traffic along the proposed project or the local community supports the incorporation of facilities at this time.
- The route provides access across a natural or man-made barrier (i.e. bridges over rivers, roadways, or railroads or under access controlled facilities).

The Practical Design guide goes on to say, "The provision of pedestrian facilities on improvement projects during planning, and design activities is necessary when any of the following conditions exist" and lists six warrants. The The I-29/I-35 Railroad Bridge meets these four of those warrants:

- There is public support through local planning organizations for the provision of pedestrian facilities.
- Pedestrian traffic generators are located near the proposed project (i.e. residential neighborhoods, employment centers, shopping centers, schools, parks, libraries, etc.).
- There is evidence of pedestrian traffic along the proposed project or the local community supports the incorporation of facilities at this time.
- The route provides access across a natural or man-made barrier (i.e. bridges over rivers, roadways, or railroads or under access controlled facilities).

Bicycle/Pedestrian Crossing Near or Adjacent to an Interstate Freeway

Some MoDOT and FHWA officials have maintained the locating a bicycle/pedestrian path near an interstate freeway is unsafe.

John Thomas, Planner with Alta Planning+Design, a nationally recognized firm specializing in bicycle/pedestrian project design, has been studying bicycle and pedestrian facilities located
13H alongside interstate freeways. Thomas sums up what is known about safety of these facilities: "While bike/ped injuries happen, they certainly aren't happening on the bridges of limited access highways."

Years of experience in operating such facilities at locations across the country have shown that such facilities are indeed safe, feasible, and reasonable if separated appropriately from freeway traffic and constructed properly.

If this type of facility is actually dangerous then the EIS should demonstrate this fact through data from the existing facilities. If, as we believe, the data support the safety of such facilities, then the EIS should acknowledge this fact.

Even here in Missouri, numerous bicyclists and pedestrians safely use the Page Avenue Extension (MO Hwy 364) Missouri River bridge in the St. Louis area each year. This bridge has 10 lanes of high speed traffic and a separated bicycle/pedestrian path similar to that proposed for the I-29/I-35 bridge. In Kansas City, Kansas, the Woodswether Bridge is a bicycle/pedestrian path across the Kaw River on the lower level of the I-70 bridge. Its safety is in no way affected by the fact that is part of an interstate bridge structure.

Freeway bridges with bike/ped paths

A partial list of interstate freeway bridges in the United States with bicycle/pedestrian crossings as part of the bridge structure:

- Interstate 90 floating bridges across Lake Washington, Seattle—8 lanes plus bike/ped lane immediately adjacent, separated by a cement barrier.
- I-494 over the Mississippi River near Minneapolis, Minnesota—path is immediately adjacent to the freeway, separated by a stone barrier.
- Squaw Peak Freeway in Phoenix AZ

- Appalachian Trail at I-80 Delaware Water Gap NJ-PA
- Wonders Way on the Ravenel Bridge Charleston S.C. (new)
- I-84 Newburgh Beacon Bridge over the Hudson River, NY
- I-95 Gold Star Memorial Bridge over the Thames River, New London, CT
- George Washington Bridge I-95 NY-NJ includes a sidewalk accessible to pedestrians on the south side and a path accessible to bicyclists and pedestrians on the north side
- Ben Franklin Bridge I-76 PA-NJ
- I-95/I-495 bridge over the Potomac on the Capital Beltway in Washington, D.C., now under construction, will have an adjacent shared-use path on the bridge for more than a mile
- I-90 bridge over the Fox River in the Chicago area has a bicycle path underneath the main bridge
- I-80 crossing the eastern reaches of San Francisco Bay has an adjacent bicycle/pedestrian path
- I-680 crossing San Francisco Bay in California will have an adjacent bicycle/pedestrian path (under construction)
- I-10 over the Colorado at Blythe, CA
- Scudder Falls Bridge I-95 PA-NJ (proposed)
- Woodrow Wilson Bridge I-95 MD-VA (proposed)
- The Record of Decision for two planned new interstate highway bridges across the Ohio River in or near Louisville includes separated bicycle/pedestrian facilities for both bridges
- Interstate 395 bridge across the Potomac River in Washington, D.C. (immediately adjacent sidepath separated via jersey barriers)
- Interstate 66 bridge across the Potomac River in Washington, D.C. (immediately adjacent sidewalks on each side separated by guard rail)
  The I-395 and I-66 bike/ped facilities have existed for more than two decades without any safety problems related to their immediate proximity to the roadway.

Freeways with bicycle/pedestrian paths in their right-of-way

- Glenn Highway, Anchorage, Alaska - pathway adjacent to the first 22 miles of the Glenn Highway out of Anchorage, a 4&6 lane controlled access freeway; mostly unfenced and on the far side of drainage swale, some behind guardrail
- I-66, Arlington, VA. The Custis Trail - mostly retaining walls or sound proofing walls separating, but in some sections just grassy shoulder/chain link fence; in 20 yrs no reports of runaway cars on the trail or trail users on the freeway
- I-95, Brunswick, Maine - path adjacent to freeway for 3-4 miles; separated by distance and a chainlink fence
- I-70, Glenwood Canyon, Colorado; Vail Pass, Colo.
- I-205, Portland, OR
- I-670, Columbus, Ohio - usually separated by grade but sometimes just a noise wall
- I-84, Portland, OR
- I-84 and I-384, Hartford and Manchester, Connecticut - Charter Oak Greenway parallels the freeway for about 4 miles
- I-80/I-215, Salt Lake City, Parleys Crossing, UT - several miles of shared use path between the freeway travelways on an old railbed
- I-291 (Bissell Bridge), Hartford, Connecticut
- I-80, Park City-Wanship, UT

- Hwy. 1, Castroville to Seaside, California
- Route 390 Expressway, Rochester, NY
- Suncoast Parkway, Tampa, Florida
- Route 104 Expressway, Rochester, NY
- I-82, Yakima, Washington
- I-435, Overland Park, Kansas - runs parallel to I-435 for a distance of about 1.5 miles, separated from the freeway by a fence

Integration with regional long-range plans

We believe that this project must fit into the region's goals and vision for transportation as articulated in MARC's LRTP. If large and significant projects such as these do not align with the LRTP, then the LRTP is rendered meaningless.

In particular, the LRTP looks and streets and highways, public transportation, pedestrian elements, bicycle elements, good movement, environmental concerns, transportation management, and safety. If a large and central project such as the I-29/I-35 neglects one of these elements or creates an impediment to it, then the purpose of the LRTP is frustrated in an important way.

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The LRTP says, "The plan views transportation in terms of the movement of people and goods, not just vehicles. . . . [I]t stresses the interrelationships between these modes and promotes the integration of the individual facilities and services into a system that efficiently and cost-effectively meets the access and mobility needs of the region." (Transportation Outlook 2030 Update, Executive Summary, page 1).

We feel strongly that the purpose and needs of the I-29/I-35 project must dovetail with these regional goals.

Project Purpose and Needs

The purpose and need of this project is very narrowly drawn. Unfortunately, because of the nature of the given purpose and need, and because it considers only automobile traffic, decisions made in accordance with this purpose and need will have a detrimental effect on the social, cultural, and natural environment of the Kansas City area.

We believe that this and future projects in the Kansas City area should include improving bicycle and pedestrian travel and removing barriers to bicycle and pedestrian travel as important components of project purposes and needs.

13J

Much of the difficulty and delay in this project could have been avoided if these considerations had been included from the beginning.

The purpose and need of transportation projects should reflect the stated needs of the region, the state, and the nation:

- MARC's LRTP stresses the movement of people and goods and the interrelationship between transportation modes. Each project should strengthen various modes. Furthermore,

three of the LRTP's focus areas are relevant to this project: Increase modal choice, Better integrate projects into the community, and Better manage roadway capacity.

- MARC's recently adopted river crossings policy states as its objective, "to ensure that safe, practical and appropriate bicycle and pedestrian accommodations will be considered in the planning and design of all surface transportation projects that cross the Kansas and Missouri Rivers in the Kansas City metropolitan area and that such accommodations will be made wherever warranted and feasible."
- MoDOT's own vision is of "a world-class transportation experience", which suggests integrating the needs of people more than simply automobiles—which is but one of numerous ways people transport themselves and their goods.
- MoDOT's TrailMap for Nonmotorized Transportation has the vision "To make Missouri a world-class state in which to bike and walk" the value "Giving Missourians the ability to choose to walk or bike to destinations" and "giving all Missourians the freedom to choose nonmotorized transportation by providing access, connectivity, encouragement and opportunity."
- 23 USC 135 says, "It is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and through urbanized areas, while minimizing transportation-related fuel consumption and air pollution."

The Logic of Project Evaluation

According to the logic employed in evaluating the different proposed alternatives, each alternative was considered separately against the stated purpose and needs.

This is a flawed approach and we hope that better evaluation methods will be used as the project moves forward.

Just for example: Assume a light rail transit proposal had been considered as an option. Assume that a study showed light rail would carry the same number of passengers as the freeway widening project but could be built at 50% of the cost.

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According to any common-sense analysis, this (fictitious) project should have come out on top of project scoring--it is moving the same number of people at half the cost.

But evaluating this fictitious light rail project according to the stated purpose and need it would be eliminated immediately.

Why? It doesn't improve traffic flow, road geometry, traffic safety, and all the other factors used to evaluate the projects.

The entire project evaluation method is seriously flawed. The evaluation must rate how the project would move people and goods and other practical factors but should not be biased for or against any particular mode of travel.

A further problem with the scoring procedure is this: If a particular proposal *standing on its own* did not meet the stated purpose and need then it was eliminated from further analysis. (We do

understand that these proposals could then later be considered as a sort of "add-on" to the main proposal.)

The problem with this type of analysis is that it is unlikely to arrive at the optimal solution to the problem of dealing with Kansas City's transportation problem. Many of the proposed alternatives, such as bike/ped, transit, traffic management, and parallel arterials, where not necessarily intended to stand alone. Rather, they are proposals that improve the effectiveness or expand the reach of whatever main proposal is adopted.

Furthermore, there will in many cases be a synergistic effect among various proposals. For instance, traffic management systems may improve the attractiveness of HOV lanes and transit systems. Better bicycle and pedestrian accessibility (especially on streets that cross the interstate freeway, giving better access to transit stops) may increase the viability of transit. A preferred alternative that combines various approaches is almost certain to be more effective in moving people and goods and reducing environmental impact than any one proposal standing on its own.

Since proposals are not considered in groups the DEIS cannot analyze these "combined alternatives" or their cost effectiveness.

It is exactly this type of synergy that the design-build process is supposed to maximize.

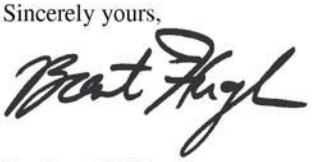
As this project moves into the design-build phase, better evaluation procedures should be developed to allow the design-build team to incorporate these synergistic elements.

The option finally built should meet the needs of all area residents, including the more than 25% who have no driver's license and the more than 13% of area households with no access to an automobile.

Again, we very much appreciate the opportunity to work with MoDOT on this important project. We very much appreciate the progress MoDOT has made in understanding the need for bicycle and pedestrian connectivity in the urban core of Kansas City.

We hope to continue working together to make this project successful for all who live, work, or travel in this area.

Sincerely yours,



Dr. Brent D. Hugh
Executive Director
Missouri Bicycle Federation

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Exhibit 1: Eleven bicycle/pedestrian crossing points of the project corridor

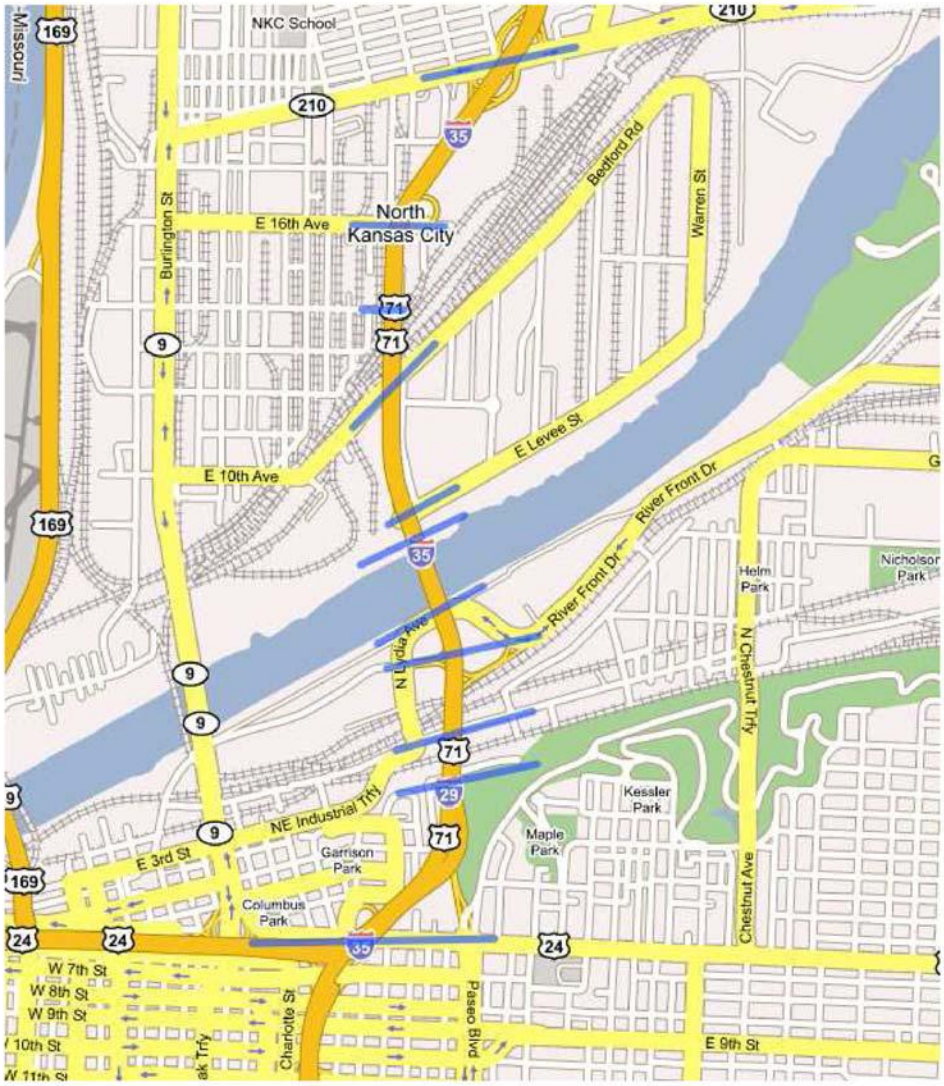

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Exhibit 2: Bicycle/Pedestrian "Islands" in Kansas City's urban core

For bicyclists and pedestrians, the freeway systems, the river, and the natural topography of the area divide Kansas City's urban core into a patchwork of bicycle and pedestrian "islands". The map indicates 20 different bicycle/pedestrian islands within Kansas City's urban core.

Within each island (represented on the map by a single area of color) it is possible to travel to destinations by walking and bicycling. But getting from one island to the next is difficult, dangerous, and some cases, actually impossible.

For instance, it is possible to walk or bicycle from the main part of North Kansas City (blue color) along 10th Ave, across the railroad yard, under I-35/I-29 and to the Paseo Industrial District (red color). But doing so requires building a 45-minute buffer into the schedule to allow for typical waiting times to cross the seven pairs of railroad tracks.

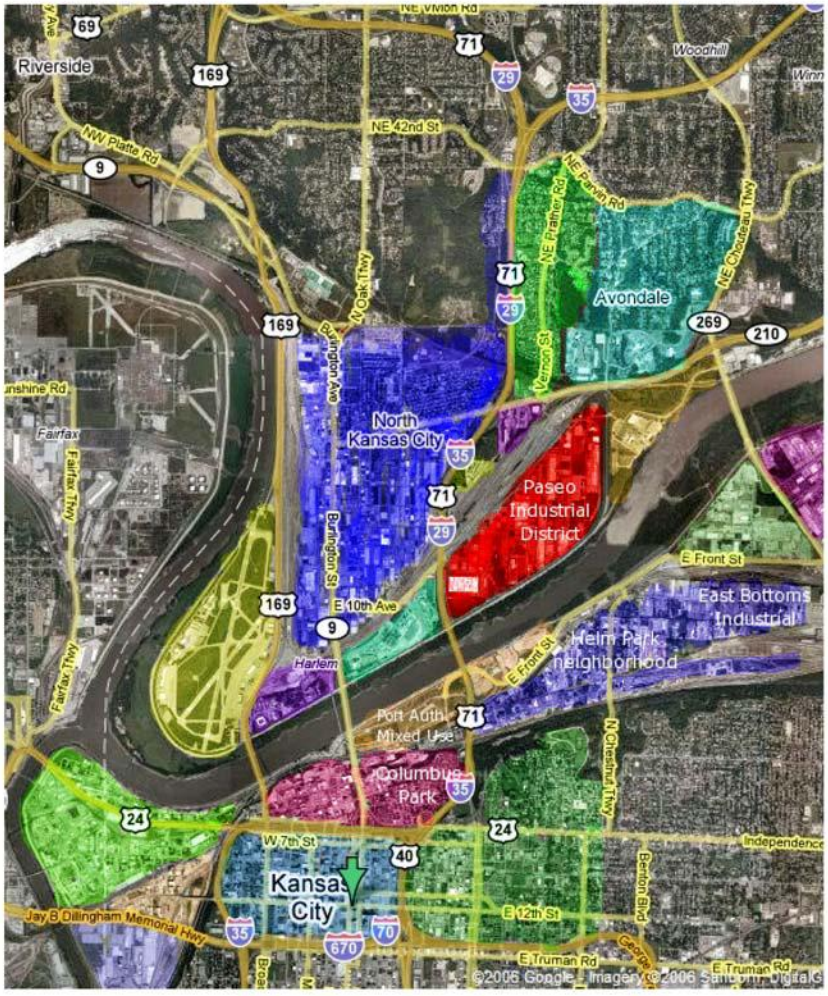

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Exhibit 3: Ramp-style interchanges vs. 90-degree style interchanges

90-degree style interchanges are much safer and easier for bicyclists and pedestrians to traverse.

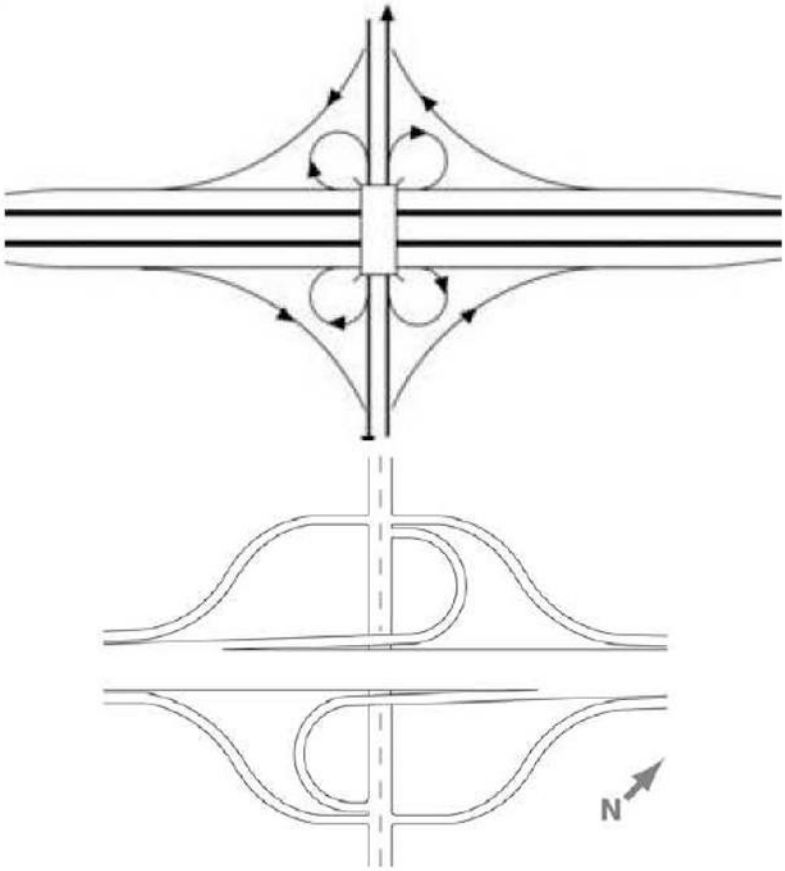

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Exhibit 4: Direct connections made by bike/ped facilities on Paseo Bridge over the Missouri River

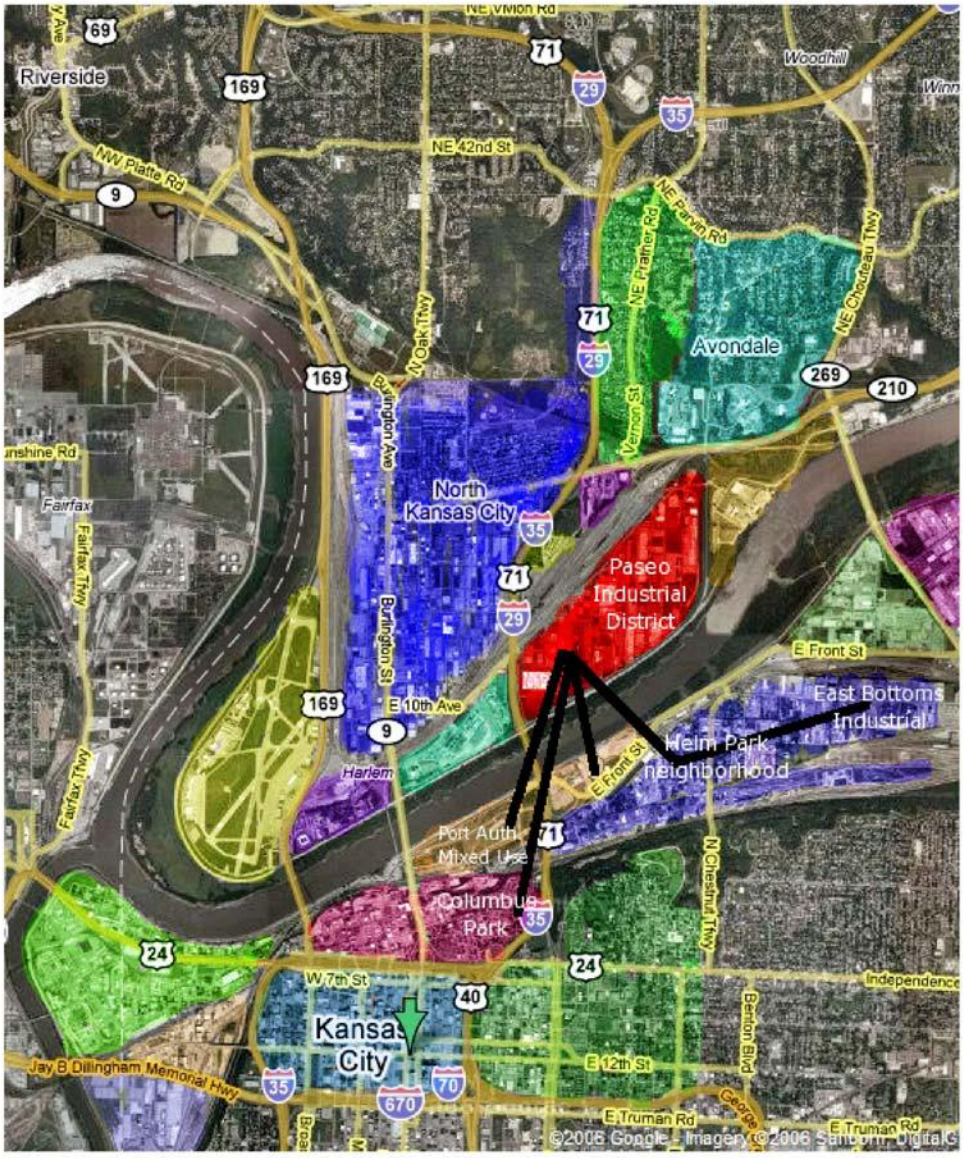

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Exhibit 5: Direct connections made by bike/ped facilities on the I-29/I-35 bridge over the Burlington Northern Railroad yard

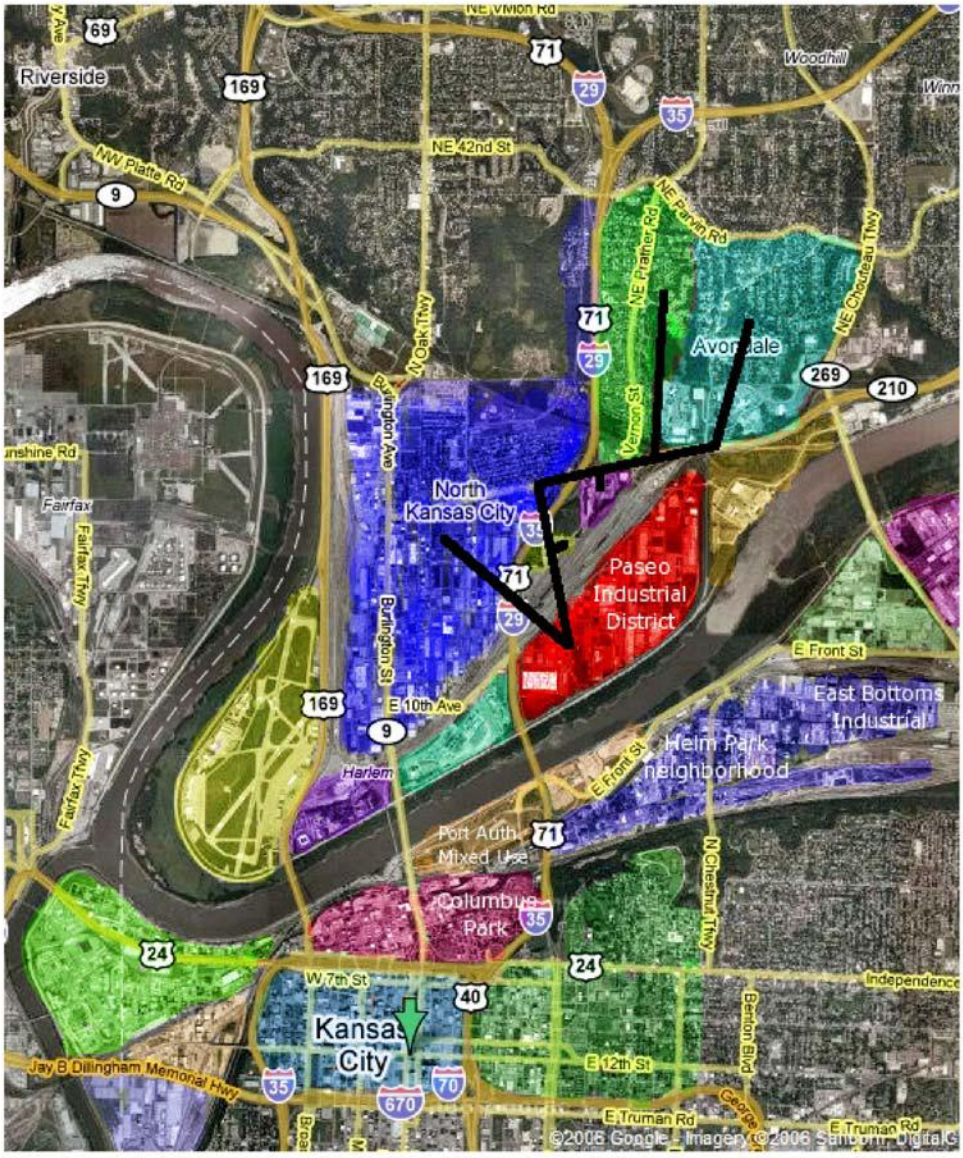

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Exhibit 6: Connections made by bike/ped facilities on the Paseo Bridge and on the I-29/I-35 bridge over the Burlington Northern RailRoad yard

None of these connections can be made via the Heart of America Bridge (Hwy 9)